

Certification of CPNI Filing

February 3, 2006

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of Secretary
445 12th Street, SW
Washington, D.C. 20554

Re: EB-06-TC-060 and EB Docket No. 06-36

Dear Ms. Dortch:

The accompanying certification and statement is filed in response to the Public Notice issued by the Commission January 30, 2006, *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, (DA-06-223).

As directed, a copy of this report has been sent to Bryon McCoy of the Commission's Enforcement Bureau, Telecommunications Consumers Division.

All inquiries in connection with this filing should be addressed to our office.

Respectfully submitted,



Rhonda S. Goddard
Chief Operating Officer-Regulated
Rural Telephone Service Company, Inc.

Enclosures

cc: Bryon McCoy, Telecommunications Consumers Division
byron.mccoy@fcc.gov
Best Copy and Printing, Inc,
fcc@bcpiweb.com

Statement of CPNI Operating Procedures

Rural Telephone Service Company, Inc.

Rural Telephone Service Company, Inc. hereby submits that its procedures regarding its customers' Customer Proprietary Network Information ("CPNI") are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Rural Telephone Service Company, Inc. uses its customers' CPNI in compliance with the Commission's rules in 47 CFR §§64.2001-64.2009. It has provided proper, individual notice to each of its customers and, dependent on use, given its customers the required regulatory time period to either allow usage of CPNI or disallow CPNI usage.


Rural Telephone Service Company employees, including marketing and sales personnel and customer service representatives, have been educated about CPNI, federal regulations and Rural Telephone Service Company's statutory responsibility to its customers. Any unauthorized use, sale, or otherwise disclosure of CPNI by any employee would subject the employee to disciplinary action. For the first violation, an employee will be given a warning and the violation will be noted on the employee's record. An employee will be subject to termination of employment for a second violation.

By accessing company records, the employees may easily determine the CPNI status of individual customers prior to using CPNI. Rural Telephone Service Company, Inc. maintains a written log regarding outbound usage of CPNI including a description of the marketing activity, which products and/or services were marketed and the specific CPNI used. All sales and marketing personnel obtain approval from his/her supervisor of any outbound usage of CPNI. Rural Telephone Service Company currently does not sell, rent or otherwise disclose customers' CPNI to non-affiliated entities. If Rural Telephone Service Company's affiliates are allowed to access customers' CPNI, then such disclosure is noted in the written log.

In compliance with the Commission's rules, Rural Telephone Service Company does not use, disclose or permit access to customers' CPNI for the purposes of identifying customers placing calls to competing carriers.

**2006 ANNUAL CERTIFICATION – Customer Proprietary Network
Information Procedures of Rural Telephone Service Company, Inc.**

I, Rhonda Goddard, hereby certify that I have personal knowledge that Rural Telephone Service Company, Inc. has established operating procedures regarding the Customer Proprietary Network Information generated by the customers of Rural Telephone Service Company, Inc. These procedures, described on the attached page, are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

 Signed:

By: Rhonda Goddard
Chief Operating Officer-Regulated